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Attorney for Plaintiff(s)  
201-853-1505

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ELESSANDRO D. ALMEIDA,  
Plaintiff(s),

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: MIDDLESEX COUNTY

v.

DOCKET NO. MID-L-

MICHAEL A. SCHMID, PUBLIC  
SERVICE ELECTRICAL AND GAS,  
PSEG, TIMOTHY M. DONALDSON, SBA  
NETWORK SERVICES LLC, JOHN DOE  
1-10 (fictitiously named),  
and ABC Co. 1-10 (fictitiously  
named)

CIVIL ACTION

Defendant(s)

**COMPLAINT  
and  
JURY DEMAND**

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The Plaintiff, Elessandro D. Almeida, residing at 186 Central Avenue in the City of Englewood, Bergen County, New Jersey, by way of Complaint against the Defendants, says:

**FIRST COUNT**

1. On or about the 1st day of June 2017, the Plaintiff, Elessandro D. Almeida, was injured in a motor vehicle accident traveling on Interstate 287 in the Township of Edison, Middlesex County, New Jersey.

2. At the above time and place, the Defendant, Michael A. Schmid, residing at 68 Agress Road in the Township of Millstone, Monmouth County, New Jersey, was operating a motor vehicle with the permission and consent, expressed or implied or in capacity as agent, servant or employee of the owner Defendant, Public Service Electrical and Gas, PSEG, located at 80 Park Plaza, in the City of Newark, Essex County, New Jersey, traveling on Interstate 287 in the Township of Edison, Middlesex County, New Jersey.

3. At the above time and place, the Defendants so carelessly, negligently and recklessly operated, maintained and/or repaired said vehicle so as to cause a collision with Plaintiff.

4. At the same time and place, the Defendants, John Doe 1-10 (fictitiously named) and ABC Co. 1-10 (fictitiously named), their agents or assigns so carelessly, negligently and recklessly operated, owned, maintained and/or repaired said vehicle so as to cause the within collision.

5. As a direct and proximate result of the foregoing, the Plaintiff, Elessandro D. Almeida, was caused to sustain serious and permanent injuries, as more particularly defined and set forth in N.J.S.A. 39:6A-8(a) and has suffered great pain, shock, and mental anguish and was, and still is, incapacitated and will be permanently disabled, and has in the past and will in the future be caused to expend substantial sums of money for medical treatment.

**WHEREFORE,** the Plaintiff, Elessandro D. Almeida, demands judgment for damages against the Defendants, jointly and severally, together with interest and costs of suit.

#### **SECOND COUNT**

1. Plaintiff repeats and reiterates each and every allegation contained in the First Count of the Complaint as if the same were fully set forth herein at length.

2. On or about the 1st day of June 2017, the Plaintiff, Elessandro D. Almeida, was injured in a motor vehicle accident traveling on Interstate 287 in the Township of Edison, Middlesex County, New Jersey.

3. At the above time and place, the Defendant, Timothy M. Donaldson, residing at 52 Conklin Avenue in the Borough of Hillsdale, Bergen County, New Jersey, was operating a motor vehicle with the permission and consent, expressed or implied or in capacity as agent, servant or employee of the owner Defendant, SBA Network Services LLC, located at 8051 Congress Avenue, Boca Raton, Florida, traveling on Interstate 287 in the Township of Edison, Middlesex County, New Jersey.

4. At the above time and place, the Defendants so carelessly, negligently and recklessly operated, maintained and/or repaired said vehicle so as to cause a collision with Plaintiff.

5. At the same time and place, the Defendants, John Doe 1-10 (fictitiously named) and ABC Co. 1-10 (fictitiously named), their agents or assigns so carelessly, negligently and recklessly operated, owned, maintained and/or repaired said vehicle so as to cause the within collision.



6. As a direct and proximate result of the foregoing, the Plaintiff, Elessandro D. Almeida, was caused to sustain serious and permanent injuries, as more particularly defined and set forth in N.J.S.A. 39:6A-8(a) and has suffered great pain, shock, and mental anguish and was, and still is, incapacitated and will be permanently disabled, and has in the past and will in the future be caused to expend substantial sums of money for medical treatment.

**WHEREFORE**, the Plaintiff, Elessandro D. Almeida, demands judgment for damages against the Defendants, jointly and severally, together with interest and costs of suit.

**DESIGNATION OF TRIAL COUNSEL**

Pursuant to the provisions of R.4:25-4, the Court is advised that Brandon J. Broderick, is hereby designated as trial counsel.

**JURY DEMAND**

Plaintiff hereby demands a Trial by jury as to all issues herein.

**CERTIFICATION PURSUANT TO RULE 4:5-1**

Pursuant to Rule 4:5-1, the undersigned certifies that the matter in controversy is not the subject of any other action in any Court or of a pending arbitration proceeding, nor is any other action or arbitration proceeding contemplated.

BRANDON J. BRODERICK, LLC

A handwritten signature in black ink, appearing to read 'BJB', is written over a horizontal line.

Brandon J. Broderick, Esq.  
Attorney for Plaintiff

Dated: February 19, 2019